

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JOSEPH S. BEALE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
REVOLUTION PORTFOLIO, LLC,	)	Case No. 07 CV 6909
SECURITY LIFE OF DENVER	)	
INSURANCE COMPANY d/b/a ING,	)	Judge Kocoras
ARKIN YOUNGENTOB ASSOCIATES,	)	
LLC and STUART YOUNGENTOB,	)	Magistrate Judge Valdez
	)	
Defendants,	)	
REvolution PORTFOLIO, LLC,	)	
	)	
Counter Plaintiff,	)	
	)	
v.	)	
	)	
JOSEPH S. BEALE,	)	
	)	
Counter Defendant.	)	

**UNOPPOSED MOTION OF ARKIN YOUNGENTOB ASSOCIATES, LLC AND  
STUART YOUNGENTOB FOR EXTENSION OF TIME TO RESPOND OR OTHERWISE  
PLEADTO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Movants/Defendants Arkin Youngentob Associates, LLC and Stuart Youngentob (collectively referred to as "Movants"), by and through their counsel and in accordance with Fed. R. Civ. P. 6(b) and all applicable Local Rules, hereby move for an extension of time in which to respond to Plaintiff's First Amended Complaint to and including August 1, 2008. In support thereof, Movants respectfully states as follows:

1. Movants were named as additional party Defendants in Plaintiffs' First Amended Complaint which was filed on or about June 11, 2008.

2. As of the date of filing of this Motion, no return of service appears to have been filed with the Clerk of the Court with respect to service upon Movants; however, Plaintiff is believed attempted to effectuate service upon Arkin Youngentob Associates, LLC on or about June 18, 2008.

3. To the extent that service was effectuated on June 18, 2008, the deadline for Arkin Youngentob Associates, LLC's to respond or otherwise plead to Plaintiff's First Amended Complaint is on or before Tuesday, July 8, 2008.

4. Good cause exists for an extension of the deadline until on or before August 1, 2008 in that counsel for Movants recently was retained to represent Movants in this matter and is need of additional time in which to gather information and to prepare a response on behalf of Movants, especially since Movant/Defendant Stuart Youngentob will be out of the country and unavailable for a period of time over the next two to three weeks.

5. Prior to the filing of this Motion, counsel for Movants spoke with counsel for Plaintiffs, Richard Douglass, to determine whether Plaintiff had any objection to extending and/or setting the filing deadline until on or before Friday, August 1, 2008.

6. Counsel for Plaintiff confirmed, via e-mail, that Plaintiff would not object to extending the deadline to on or before August 1, 2008.

7. No prior extensions have been requested by Movants and this Motion is not being asserted to needlessly delay these proceedings.

WHEREFORE, Defendant Arkin Youngentob Associates, LLC and Stuart Youngentob moves for entry of an order extending the deadline to respond, answer or otherwise plead to Plaintiff's First Amended Complaint to and including August 1, 2008, and for such other and further relief as is just and equitable.

Respectfully submitted,  
Movants

By: /s/Martin Q. Ryan  
One of the Attorneys for  
Arkin Youngentob Associates, LLC  
and Stuart Youngentob,

Martin Q. Ryan  
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**Certificate of Service**

Martin Q. Ryan, an attorney, hereby certifies that, on July 3, 2008, he caused a true and correct copy of the foregoing *UNOPPOSED MOTION OF ARKIN YOUNGENTOB ASSOCIATES, LLC AND STUART YOUNGENTOB FOR EXTENSION OF TIME TO RESPOND OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED COMPLAINT* to be filed electronically with the Court's CM/ECF system, and that notice of this filing was sent by electronic mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to receive electronic filings as indicated in the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Martin Q. Ryan

Martin Q. Ryan